

Text from Northeast Utilities email:

Richard, I do not like the idea of having Energy Star water heaters because of the market confusion that it will cause:

1) An electric E-star water heater will probably (in most cases) cost more to operate than a fossil fuel non E-star water heater. Yet customer may be likely to choose the electric heater because of the label even though it may not be in their best interest.

2) Along the same vein, this is inconsistent with the normalization factors that are used in the HERS industry meaning that an electric E-star water heater may NOT be the right choice for your home because it will lower the HERS score compared to a fossil fuel non E-star water heater.

3) Water heaters already have easy to read/understand Energy Guide Labels. Why fix it if it's not broken. I think the risk of market confusion outweighs any benefits.

4) How will indirect water heaters (from a boiler) be considered? This will possibly encourage contractors and consumers to install a separate Energy Star Water heater along with a boiler even though an indirect off-the-boiler may be (and probably is) the preferred option for the consumer.

5) I think the proposed standard for gas water heaters is a joke when you consider the technology that's out there right now.

Those are my thoughts.

Joe Swift
Northeast Utilities